

MBF 1293



**COUNTY OF ORANGE
HEALTH CARE AGENCY**

**PUBLIC HEALTH SERVICES
ENVIRONMENTAL HEALTH**

**JULIETTE A. POULSON, RN, MN
DIRECTOR**

**DAVID M. SOULELES, MPH
DEPUTY AGENCY DIRECTOR**

**RICHARD SANCHEZ, REHS, MPH
INTERIM DIRECTOR
ENVIRONMENTAL HEALTH**

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MAILING ADDRESS:
1241 EAST DYER ROAD, SUITE 120
SANTA ANA, CA 92705-5611

TELEPHONE: (714) 433-6000
FAX: (714) 754-1732
E-MAIL: ehhealth@ochca.com

October 11, 2007

Dominick Baione
Universal Molding Extrusion Company
9151 East Imperial Highway
Downey, CA 90242

Subject: Work Plan for Additional Assessment, Soil Vapor Extraction

**Re: Fullerton Business Park-North
1551 Orangethorpe Avenue
Fullerton, CA 92833
OCHCA Case #07IC015**

Dear Mr. Baione:

Orange County Health Care Agency (OCHCA), Environmental Health has reviewed the subject work plan, dated October 5, 2007, submitted by The Reynolds Group. OCHCA finds the work plan to be acceptable, provided the following considerations are addressed:

1. The soil permeability and radius of influence cited from another consultant must be independently verified, and the soil vapor extraction system design modified accordingly.
2. Final verification of the successful completion of remedial action must be conducted in the presence of OCHCA staff.

If you have any questions regarding this matter, please contact the undersigned at (714) 433-6253.

Sincerely,

Luis Lodrigueza
Hazardous Waste Specialist
Hazardous Materials Mitigation Section
Environmental Health Division

MWNA-WZI 106882

cc: Kamron Saremi, California Regional Water Quality Control Board- Santa Ana Region
John Cleary, The Reynolds Group, 520 West First Street, Tustin, CA 92780
James R. McFadden, Grubb & Ellis, 500 North State College Suite 100, Orange, CA 92868
John C. Glaser, Glaser, Tonsich & Associates, LLC, 765 West 9th Street, San Pedro, CA 90731



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Lodriguez
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1. The soil permeability and radius of influence cited from another consultant must be independently verified, and the soil vapor extraction system design modified accordingly.
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Sincerely,

Luis Lodrigueza
Hazardous Waste Specialist
Hazardous Materials Mitigation Section
Environmental Health Division

MWNA-WZI 106884

cc: Kamron Saremi, California Regional Water Quality Control Board- Santa Ana Region
John Cleary, The Reynolds Group, 520 West First Street, Tustin, CA 92780
James R. McFadden, Grubb & Ellis, 500 North State College Suite 100, Orange, CA 92868
John C. Glaser, Glaser, Tonsich & Associates, LLC, 765 West 9th Street, San Pedro, CA 90731

From: Lodrigueza, Luis
Sent: Monday, August 27, 2007 7:12 AM
To: 'John Cleary'
Subject: RE: (7115 UNIVERSAL) Fullerton Business Park comments on draft august 22 letter

Importance: High

Attachments: DTSC.Vapor Intrusion--Int'm Final Guide.Dec 04, revised Feb.05.pdf
One item for further clarification: The soil vapor cleanup levels I mentioned are actually human health screening levels provided by DTSC.

Although those levels were derived from risk calculations using default values and do represent concentrations that give rise to risk of less than one in a million, the ultimate cleanup standard should be indoor air concentration, which is the actual measure of the completeness of the vapor intrusion pathway. Considering the complexity of obtaining representative indoor air samples over a rather projected period of time, subslab vapor sampling is the more frequent choice as basis for the calculation of health risk. Here, the only barrier to vapor intrusion from the subsurface is the foundation slab, to which an attenuation factor is assigned in risk calculations. If risk evaluation from this still does not arrive at an acceptable level, indoor air sampling would be resorted to. Finally, if no remediation successfully reduces indoor air contaminant concentration(s) to levels that pose no adverse health effect to receptors, engineering and/or institutional controls would be in order.

Please refer to the attached DTSC Guidelines for additional information.

Luis Lodrigueza
Hazardous Waste Specialist
Orange County Health Care Agency
Environmental Health Division
Tel: (714) 433-6253
Fax: (714) 754-1786

From: John Cleary [mailto:cleary@reynolds-group.com]
Sent: Friday, August 24, 2007 11:30 AM
To: Lodrigueza, Luis
Cc: John C. Jack Glaser; F. Edward Reynolds, Jr.; Christa I. Wolfe
Subject: (7115 UNIVERSAL) Fullerton Business Park comments on draft august 22 letter

Dear Luis,

Thank you for allowing us to review your DRAFT letter.

As we just discussed on the phone, here are our comments or clarifications:

- 1) The site specific PCE soil vapor cleanup levels are 180 and 603 ug/m³ PCE for residential and commercial, respectively. The TCE soil vapor cleanup levels are 528 and 1770 ug/m³ TCE for residential and commercial, respectively.
- 2) Your request to find the lateral extent of the plume inside the warehouse is for remediation and coarse screening purposes, not for modeling purposes. You used the maximum PCE and TCE concentrations in your vapor intrusion model, not a computed statistical value.
- 3) Your request to sample within 100 feet of the extent of the plume and possibly offsite is a DTSC requirement to know if adjacent property buildings are impacted.
- 4) We acknowledged that there is an operating soil vapor extraction unit within 100 ft north of the property line at the former Johnson Controls site. We are currently collecting some additional information on the adjacent subsurface impacts to start conceptualizing our remedial action plan.

Thanks for allowing us to give some input into this letter. We look forward to receiving this letter as final and quickly advancing.

Sincerely,

John Cleary
Project Manager

----- Original Message -----

From: "Lodrigueza, Luis" <LLodrigueza@ochca.com>
To: "John Cleary" <cleary@reynolds-group.com>
Date: Wed, 22 Aug 2007 10:15:11 -0700
Subject: Fullerton Business Park

John,

Here's the letter I intend to send out. I'll wait for any comments or questions you have before mailing it out.

Email or call me if you have any questions/comments, so we can discuss.

Luis Lodrigueza
Hazardous Waste Specialist
Orange County Health Care Agency
Environmental Health Division
Tel: (714) 433-6253
Fax: (714) 754-1786



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August 24, 2007

Dominick Baione
Universal Molding Company
9151 East Imperial Highway
Downey, CA 90240

Subject: Shallow Soil Vapor Survey Report

**Re: Fullerton Business Park-North
1551 Orangethorpe Avenue
Fullerton, CA 92833
OCHCA Case #07IC015**

Dear Mr. Baione:

Orange County Health Care Agency (OCHCA), Environmental Health has reviewed the subject report submitted by The Reynolds Group. The results of this recent shallow soil vapor sampling indicated that solvent vapor concentrations at or near the foundation subslab are higher than those detected earlier at 5 ft below grade.

Using the DTSC-modified Johnson-Ettinger vapor intrusion model, OCHCA conducted a vapor risk assessment to evaluate the effect of the shallow soil vapor contamination on indoor receptors. The cumulative incremental cancer risk from PCE and TCE calculated from each of the shallow soil vapor probes ranged from 5.9E-05 to 7.9E-04. These values are orders of magnitude higher than the allowable risk of one in a million (1.0E-06).

In view of these findings, it is requested that the extent of the soil vapor plume within the warehouse (west-central and south sections) be determined. The additional soil gas survey should also include sampling of soil vapor probes as close as possible to buildings within 100 ft of the probable outer limit of the plume to evaluate the potential vapor intrusion into these structures. Please submit a work plan for this additional soil vapor survey. The information obtained from this phase will serve as the basis for a remedial action plan (RAP)—to include any necessary pilot test to determine the feasibility of the chosen remedial measure—designed to mitigate the soil vapor contamination.

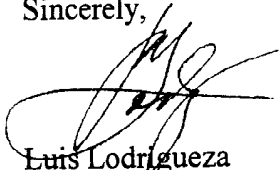
MWNA-WZI 106888

August 24, 2007

Page 2 of 2

If you have any questions regarding this matter, please contact the undersigned at (714) 433-6253.

Sincerely,



Luis Lodrigueza
Hazardous Waste Specialist
Hazardous Materials Mitigation Section
Environmental Health Division

cc: Kamron Saremi, California Regional Water Quality Control Board- Santa Ana Region
John Cleary, The Reynolds Group, 520 West First Street, Tustin, CA 92780

Lodrigueza, Luis

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Cc: John C. Jack Glaser; F. Edward Reynolds, Jr.; Christa I. Wolfe
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Thanks for allowing us to give some input into this letter. We look forward to receiving this letter as final and quickly advancing.

Sincerely,

John Cleary
Project Manager

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From: "Lodrigueza, Luis" <LLodrigueza@ochca.com>
To: "John Cleary" <cleary@reynolds-group.com>
Date: Wed, 22 Aug 2007 10:15:11 -0700
Subject: Fullerton Business Park

John,

Here's the letter I intend to send out. I'll wait for any comments or questions you have before mailing it out.

Email or call me if you have any questions/comments, so we can discuss.

Luis Lodrigueza
Hazardous Waste Specialist
Orange County Health Care Agency

8/24/2007

MWNA-WZI 106890

TABLE 1
SUMMARY OF DETECTABLE SOIL VAPOR RESULTS
SAMPLE DATE: MARCH 9, 2007

1551 E. ORANGETHORPE AVENUE
FULLERTON, CALIFORNIA
(All Results in Micrograms per Liter – ug/L)

Sample ID	Freon 113	1,1,1-TCA ⁽¹⁾	TCE ⁽¹⁾	PCE ⁽¹⁾	Vinyl Chloride	1,1-DCE ⁽¹⁾	Cis-1,2 DCE ⁽¹⁾
SV-1	4.7	53.6	69.9	OS ⁽²⁾	<1	17.4	<1
SV-1 Dil.	5.5	55	70.7	78.8	<1	18.2	<1
SV-2	<1	3.4	11	15.3	<1	3.2	1.1
SV-3	<1	12.7	38.6	36.4	<1	25.3	2.5
SV-4	<1	11.2	24.2	39.2	<1	9.1	<1
SV-5	<1	83.5	58.2	35.3	<1	40.4	1.2
SV-6	<1	71.8	115.2	80.3	<1	65.3	1.2
SV-7	6.9	11.3	101.7	99.6	<1	78.3	<1
SV-8	3.7	4.3	22.6	7.2	<1	17.7	<1
SV-9	<1	<1	11.6	53.7	<1	6	<1
SV-10	4.4	1.2	88.8	222.2	<1	79.7	<1
SV-11	<1	<1	1.9	34.9	<1	<1	<1
SV-11 Dup	<1	<1	1.8	32	<1	<1	<1
SV-12	3.9	83.5	50.4	72.8	3.2	63.6	<1
SV-13	<1	<1	16.3	7.4	1.1	7.4	<1
SV-14	8.3	6.3	98.7	50.1	<1	78.2	<1
SV-15	<1	<1	<1	1.4	<1	54.4	<1
SV-16	<1	<1	<1	<1	<1	<1	<1
SV-17	<1	<1	<1	<1	<1	<1	<1
CHHSL ⁽³⁾ Commercial	NA	7,000	4.4	1.6	.095	NA	120
CHHSL ⁽⁴⁾ Residential	NA	2,500	1.3	.47	.028	NA	41

- Notes: (1) TCA = trichloroethane, TCE = trichloroethene, PCE = tetrachloroethene
(2) OS = Results off the Electronic Scale of Detector. Another sample was diluted, and then analyzed.
(3) CHHSL Commercial = California Human Health Screening Level for Commercial Engineered Fill
(4) CHHSL Residential = California Human Health Screening Level for Residential Engineered Fill
(5) NA = Data not available from Cal EPA "Human Exposure Assessment Methodology" November 2004/January 2005 Revision

*Info required for VI modeling:
* bldg ceiling height - 10 ft
* bldg length + width + area
* distance from bldg to SV-1
* decided on one-to-two subplot
* soil gas samples taken inside bldg - to be obtained from DSC (solid phase) for SV-1
* Investigation Jan 26/2008
* Groundwater issues - consult with SARA/GIS*

From: Lodrigueza, Luis
Sent: Wednesday, July 25, 2007 12:05 PM
To: ksaremi@waterboards.ca.gov
Cc: 'bholub@waterboards.ca.gov'
Subject: Fullerton Business Park-North (1551 Orangethorpe Avenue, Fullerton)

no lub
Importance: High
Boss,

As I mentioned in my phone message, this site was closed and the SA Regional Board (Bob Holub and Augustine Anijielo), after first issuing a directive for groundwater investigation, later--after conferring with the RP--retracted from requiring the investigation because of the then successful remedial action through soil vapor extraction that reduced soil contamination to acceptable levels.

The Reynolds Group requested that OCHCA re-open this case to evaluate whether the soil gas contamination (max concentrations of 222 ug/l of PCE and 115 ug/l TCE at 5 ft bg) recently detected on site, which has PCE/TCE concentrations above the Cal EPA CHHSL, poses any significant health threat. Reynolds said that groundwater issues need not be re-ignited since the Regional Board had already concurred with an earlier case closure where groundwater investigation was not required.

I want to make sure that the Regional Board would not require the g/w investigation at this time. (Note that at the time of closure in 1995, there was 160 ppb TCE detected at 105 ft below grade. G/w depth was at 115 ft below grade, but no g/water sample was collected for analysis.)

Please clarify this for me, Boss. Thanks.

Luis Lodrigueza
Hazardous Waste Specialist
Orange County Health Care Agency
Environmental Health Division
Tel: (714) 433-6253
Fax: (714) 754-1786

STATE OF CALIFORNIA—CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

PETE WILSON, Governor

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SANTA ANA REGION

2010 IOWA AVENUE, SUITE 100

RIVERSIDE, CA 92507-2408

PHONE: (909) 782-4130

FAX: (909) 781-6288



Post-It™ brand fax transmittal memo 7671		# of pages > 2
To	LOPRIQUEZA	
From	BOB HOLUB	
Co.	RWQCB	
Dept.	Phone #	
Fax #	714-912-0749	Fax #

December 11, 1995

Mr. Carl Ross
 Red Eagle Properties Limited
 2020 Lynx Trail
 Ontario, CA 91761

FULLERTON BUSINESS PARK, 1551 EAST ORANGETHORPE AVENUE, FULLERTON

Dear Mr. Ross:

On November 1, 1995, Robert Holub and Augustine Anijelo of Board staff met with Mark Boen of Red Eagle Properties and Roger Turner regarding the above site. In September 1994, Red Eagle Properties removed two clarifiers that were present at the site and identified PCE in the soil immediately beneath one of the clarifiers. In December 1994, Converse Consultants, on behalf of Red Eagle Properties, performed a soil investigation to characterize the soil at the site. In January 1995, Converse Consultants performed an additional soil investigation. These investigations found that significant PCE concentrations were present in the shallow soil. The investigations also detected TCE to a depth near the groundwater. A report prepared by Converse Consultants stated that, based on the soil data, groundwater beneath the site had not been impacted by PCE.

As a result of the public health threat posed by the PCE in the shallow soil, Red Eagle Properties is currently remediating the shallow soil under the oversight of the Orange County Health Care Agency. Board staff reviewed the results of the soil investigations and determined that TCE, and possibly PCE, may have impacted groundwater. As a result, Board staff sent a letter dated August 9, 1995, to Red Eagle Properties. This letter stated that we did not concur that groundwater beneath the site had not been impacted, and requested that a groundwater investigation, including the installation of monitoring wells, be performed.

Based on the information obtained in the November 1, 1995, meeting, it is now our understanding that Red Eagle Properties acquired the property from the Resolution Trust Corporation in May 1994. After determining that past discharges of PCE had impacted the shallow soil, Red Eagle Properties undertook diligent efforts to mitigate those impacts by installing and operating a soil vapor extraction and treatment system. The property was then sold to the current owner in March 1995. We understand that under the terms of the sale of the property, Red Eagle Properties is continuing to operate the treatment system.

Mr. Carl Ross

-2-

December 11, 1995

It is apparent that Red Eagle Properties did not discharge the PCE that impacted the shallow soil or the PCE or TCE that may have impacted the groundwater. It is also apparent that Red Eagle Properties did not own the property during the time that those discharges took place. Please be aware that it has not been the policy of this office to hold a former owner of a property responsible for site investigation and cleanup if the former owner was not directly involved in the initial waste discharge and if the former owner did not own the property during the time that the wastes were discharged. Considering the additional information we obtained at the November 1, 1995, meeting, we withdraw our request to Red Eagle Properties to conduct a groundwater investigation.

You also asked what the responsibilities are for a current landowner at this site. Section 13304 of the California Water Code states that the Regional Board can order any person who caused or permitted waste to be discharged into waters of the state and creates, or threatens to create, a condition of pollution or nuisance, to cleanup the waste or abate the effects thereof. If such an order was issued, the party responsible for the release of the waste would be designated as the primary responsible party and the current landowner of the property would be designated as the secondary responsible party. The primary responsible party would be required to comply with all of the terms of the order. The only time that the secondary responsible party would be required to comply with any of the terms of the order, is if the primary responsible party defaulted on the order (i.e. if the primary responsible party went bankrupt or was otherwise not able to comply with the order). Although we are unable to absolve any current property owner of responsibility for any site investigation or cleanup, considering that the soil impacts at this site have been adequately mitigated, we are not considering issuing an order requiring a groundwater investigation at this time.

If you have any questions, please contact Robert Holub at (909) 782-3298 or Augustine Anijelo at (909) 782-3292.

Sincerely,



Gerard J. Thibeault
Executive Officer

cc: Luis Lodriqueza, OCHCA

RLH/AEA:slic\mscl\fullbus



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SANTA ANA, CA 92705-5611**

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FAX: (714) 754-1732
E-MAIL: ehealth@ochca.com**

July 23, 2007

Dominick Baione
Universal Molding Company
9151 East Imperial Highway
Downey, CA 90240

Subject: Request for Remedial Action Supervision

**Re: Fullerton Business Park-North
1551 Orangethorpe Avenue
Fullerton, CA 92833
OCHCA Case #07IC015**

Dear Mr. Baione:

Orange County Health Care Agency (OCHCA), Environmental Health has received the request you submitted for remedial action supervision as provided for in the California Health and Safety Code (H&SC), Division 101, Chapter 4, Article 5, Section 101480 (b), at the above referenced site. This Agency agrees to provide remedial oversight in accordance with the conditions specified on page 2 of "Request for Remedial Action Supervision" unless the California Department of Toxic Substances Control or Regional Water Quality Control Board (RWQCB) objects to OCHCA's oversight of the project within 10 business days of receipt of notification.

Where a preliminary site assessment has not already been submitted, please submit a site assessment work plan for review and concurrence by HCA staff prior to implementation. This review will help ensure the planned site assessment work includes required information. The site assessment work plan should be designed to accomplish the identification of the lateral and vertical extent of soil contamination and the concentration of contaminants. The plan should include:

1. A site history that will serve as rationale for the selection of the locations of soil samples and soil borings and laboratory methods.
2. The proposed number and locations of soil samples and soil borings, and sampling methodology.
3. The proposed laboratory analysis and method.

MWNA-WZI 106895

After completion of site assessment, a report that outlines the findings of the site assessment and presents a proposed remedial action plan should be submitted to OCHCA staff for review and concurrence. A health and safety plan will be required where site remedial activities may pose a threat to public health. After the remedial action plan has been fully implemented, remediation completion will be determined by site sampling overseen by OCHCA staff.

Upon the satisfactory completion of site assessment and necessary soil remediation, this Agency will issue a letter of completion. Where the site assessment reveals a possible threat to groundwater resources, the appropriate RWQCB will be so notified. When the RWQCB requires soil remedial action you will be requested to submit remedial action plans to both Agencies for review and concurrence.

All required permits must be obtained prior to beginning exploratory borings and construction of wells. All borings and abandoned wells must be properly sealed. Wells should be secured to prevent unauthorized access. For further information regarding required well permits and well abandonment, please contact this Agency's Water Quality Section at (714) 433-6287 or (714) 433-6288. Drilling procedures, well design and construction must be accomplished in a manner that prevents the spread of contamination. Design and procedures should be developed by a registered professional (P.G., C.E.G., R.C.E., C.H.G., or equivalent) with expertise in subsurface investigations. Reports that include logs of soil borings or any findings or conclusions relating to subsurface information must be signed by a properly registered professional (P.G., C.E.G., C.H.G., or equivalent).

If any material removed from the site is a hazardous waste, send photocopies of the manifests, signed by the receiving facility, used to transport the material as verification of its proper transportation and disposal or treatment. Contaminated soil not meeting hazardous waste criteria should not be removed off site to other than a Class I hazardous waste landfill or permitted hazardous waste treatment facility without verification by this Agency and approval of the appropriate RWQCB.

Be advised that an owner of non-residential real property who knows, or has reasonable cause to believe, that any release of a hazardous substance has come to be located on or beneath that real property shall, prior to sale, lease, or rental of the real property, give written notice of that condition to each buyer, lessee, or renter of the real property (H&SC, Division 20, Chapter 6.8, Section 25359.7[a]). Also any lessee or renter of real property who knows or has reasonable cause to believe that any release of a hazardous substance has come or will come to be located on or beneath that real property shall, following its discovery, give written notice of that condition to the owner of the real property or the lessor (H&SC Division 20, Chapter 6.8, Section 25359.7[b]).

This office has reviewed the report submitted by The Reynolds Group, as well as other available records from an earlier closed case file on this site. After a meeting with Mr. Ed Reynolds and staff of The Reynolds Group, it was agreed that additional (subslab) soil gas sampling will be conducted at the site. A report on that additional sampling, including a detailed site map

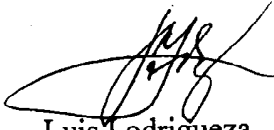
July 23, 2007

Page 3 of 3

showing building dimensions, ceiling height and sample locations, will be provided to this office for review.

If you have any questions regarding this matter, please contact the undersigned at (714) 433-6253.

Sincerely,



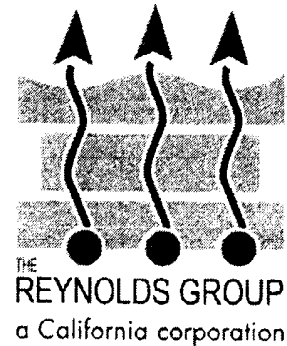
Luis Lodrigueza
Hazardous Waste Specialist
Hazardous Materials Mitigation Section
Environmental Health Division

cc: Anne Sturdivant, California Regional Water Quality Control Board- Santa Ana Region
John Cleary, The Reynolds Group, 520 West First Street, Tustin, CA 92780

**ATTORNEY-CLIENT PRIVILEGED
& CONFIDENTIAL INFORMATION**

March 19, 2007
(trg no.7115)

John C. Glaser, Esq.
GLASER, TONSICH & ASSOCIATES, LLP
765 West 9th Street
San Pedro, CA 90731



**SITE: 1551 ORANGETHORPE AVENUE
FULLERTON, CALIFORNIA**

SUBJECT: RESULTS OF SOIL VAPOR INVESTIGATION

Dear Mr. McFadden,

On March 9, 2007, The Reynolds Group (TRG), performed a soil vapor investigation at the subject site (the Site, see Figure 1 - Site Location Map). A total of 17 probes were advanced both inside and outside the Property building and soil vapor samples were collected at locations as shown on the attached Figure 2 – Plot Plan with Sample Locations. Various volatile organic compounds (VOCs) were detected in 16 of the 19 samples collected. Tetrachloroethene (PCE) and trichloroethene (TCE) concentrations in almost all soil vapor samples were above EPA California Human Health Screening Levels (CHHSLs) for commercial use properties (see Table 1 – Summary of Detectable Soil Vapor Results).

PURPOSE

The purpose of the investigation was to determine if VOCs associated with past or present uses at the Site exist in subsurface soils.

FIELD WORK

Prior to conducting the fieldwork the site was visited, sample locations were selected, and the site was marked for Underground Services Alert (USA). The fieldwork was performed on March 9, 2007. Soil vapor samples were collected at 17 locations from

Tel 714-730-5397

PO Box 1996, Tustin, California 92781-1996
www.reynolds-group.com

Fax 714-730-6476

MWNA-WZI 106898

five feet below ground surface (ft bgs) as shown on the attached Figure 2 – Plot Plan with Sample Locations. Sample locations were selected based on the location of past remediation work and the site reconnaissance.

Soil vapor samples were collected by advancing a hollow ½-inch galvanized steel tube to five feet into the ground. A vacuum pump was then used to draw vapors from below the ground surface. The methods and procedures used in the soil vapor survey were those that are acceptable to local regulatory agencies. A total of 19 vapor samples were collected from 17 locations (SV1 through SV17, SV1-Dil and SV11 Dup.) SV1-Dil indicates a second sample collected from Probe SV1 after dilution because initial concentrations from SV1 exceeded the calibrated range of the detector being used. Sample SV11 Dup is a duplicate sample collected from Probe SV11 for laboratory quality assurance and quality control purposes.

The soil vapor samples were analyzed on site by Optimal Technology of Chatsworth, California, using a gas chromatograph (see attached report). The analyses were designed to detect a variety of VOCs that, if present, may be of potential environmental concern.

The soil probes were backfilled with bentonite chips and the surfaces repaired with quick setting concrete. No field wastes were generated during the work.

RESULTS OF FIELD WORK

Various VOCs were detected in 17 of the 19 soil vapor samples collected, including Freon 113, 1,1,1-trichloroethane (TCA), trichloroethene (TCE), tetrachloroethene (PCE), vinyl chloride, 1,1-dichloroethene (DCE), and cis-1,2 DCE (see Table 1 – Summary of Detectable Soil Vapor Results). PCE concentrations ranged from 1.4 to 222.2 micrograms per liter (ug/L) and TCE ranged from 1.8 to 115.2 ug/L. Most levels of detectable PCE and TCE in the samples collected are above the CHHSLs for commercial properties of 1.6 and 4.4 ug/L, respectively.

CONCLUSIONS

Based on the results of this investigation the shallow soils at the site appear to be impacted by VOCs.

REGISTERED PROFESSIONAL STATEMENT

All work on this project was performed under the responsible charge of a California Registered Civil Engineer. The licensed professional whose wet ink signature and seal appear at the end of this report actually supervised or personally conducted all work associated with the project.

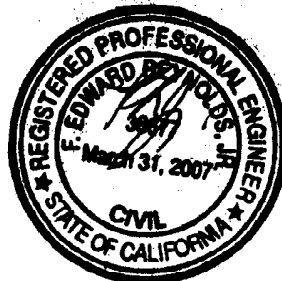
Should you have questions regarding this report, please contact me directly at (714) 730-5397 Ext. 110.

Sincerely,

THE REYNOLDS GROUP,
a California corporation by:

F. Edward Reynolds, Jr.

F. Edward Reynolds, Jr.
California Registered Civil Engineer #38677



Enclosures: Table 1 – Summary of Detectable Soil Vapor Results
Site Location Map
Plot Plan with Sample Locations
Optimal Technology Soil Vapor Survey Report and Results

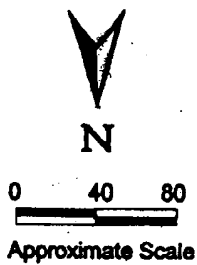
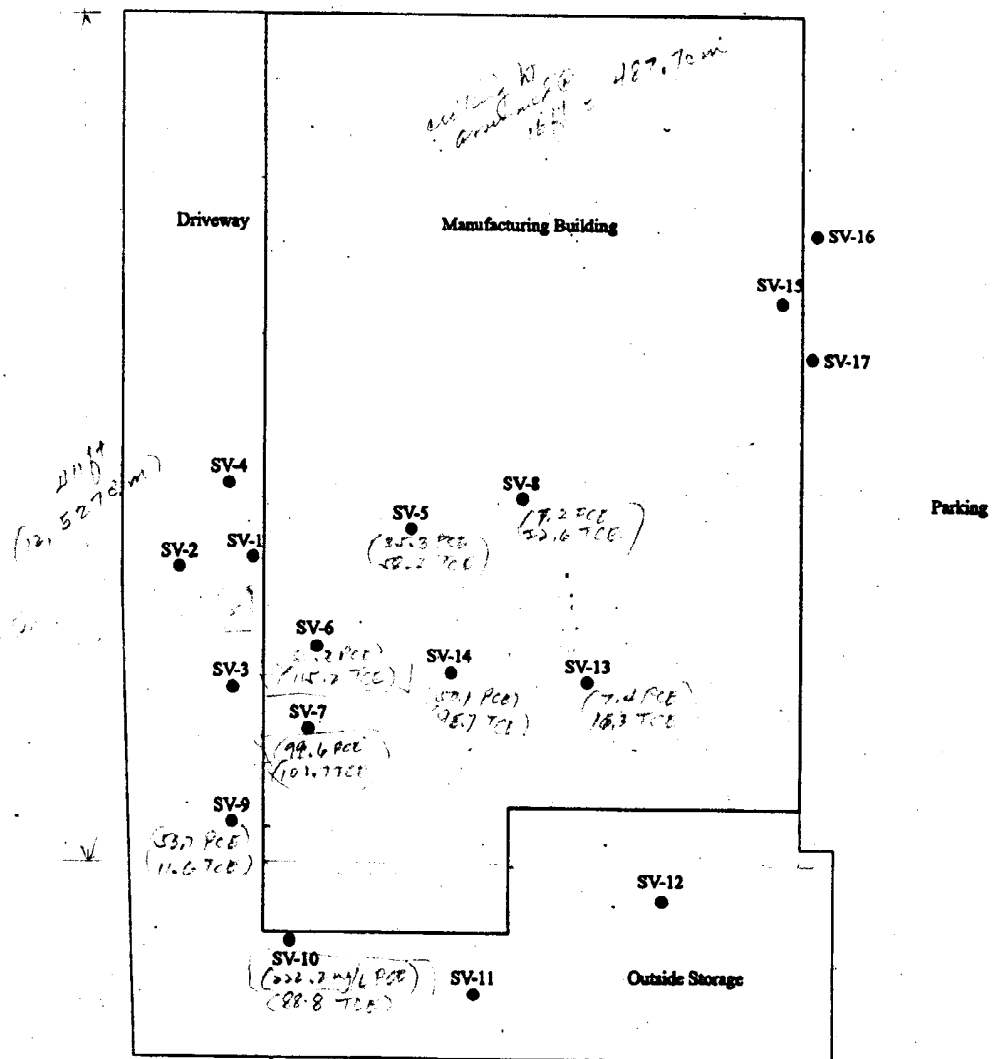
TABLE 1
SUMMARY OF DETECTABLE SOIL VAPOR RESULTS
SAMPLE DATE: MARCH 9, 2007

1551 E. ORANGETHORPE AVENUE
FULLERTON, CALIFORNIA
(All Results in Micrograms per Liter – ug/L)

Sample ID	Freon 113	1,1,1-TCA ⁽¹⁾	TCE ⁽¹⁾	PCE ⁽¹⁾	Vinyl Chloride	1,1-DCE ⁽¹⁾	Cis-1,2 DCE ⁽¹⁾
SV-1	4.7	53.6	69.9	OS ⁽²⁾	<1	17.4	<1
SV-1 Dil.	5.5	55	70.7	78.8	<1	18.2	<1
SV-2	<1	3.4	11	15.3	<1	3.2	1.1
SV-3	<1	12.7	38.6	36.4	<1	25.3	2.5
SV-4	<1	11.2	24.2	39.2	<1	9.1	<1
SV-5	<1	83.5	58.2	35.3	<1	40.4	1.2
SV-6	<1	71.8	115.2	80.3	<1	65.3	1.2
SV-7	6.9	11.3	101.7	99.6	<1	78.3	<1
SV-8	3.7	4.3	22.6	7.2	<1	17.7	<1
SV-9	<1	<1	11.6	53.7	<1	6	<1
SV-10	4.4	1.2	88.8	222.2	<1	79.7	<1
SV-11	<1	<1	1.9	34.9	<1	<1	<1
SV-11 Dup	<1	<1	1.8	32	<1	<1	<1
SV-12	3.9	83.5	50.4	72.8	3.2	63.6	<1
SV-13	<1	<1	16.3	7.4	1.1	7.4	<1
SV-14	8.3	6.3	98.7	50.1	<1	78.2	<1
SV-15	<1	<1	<1	1.4	<1	54.4	<1
SV-16	<1	<1	<1	<1	<1	<1	<1
SV-17	<1	<1	<1	<1	<1	<1	<1
CHHSL ⁽³⁾ Commercial	NA	7,000	4.4	1.6	.095	NA	120
CHHSL ⁽⁴⁾ Residential	NA	2,500	1.3	.47	.028	NA	41

- Notes: ⁽¹⁾ TCA = trichloroethane, TCE = trichloroethene, PCE = tetrachlorethene, DCE = dichloroethene
⁽²⁾ OS = Results off the Electronic Scale of Detector. Another sample was collected (SV-1 Dil), diluted, and then analyzed.
⁽³⁾ CHHSL Commercial = California Human Heath Screening Levels for Commercial Use With 5' Engineered Fill
⁽⁴⁾ CHHSL Residential = California Human Heath Screening Levels for Residential Use With 5' Engineered Fill
⁽⁵⁾ NA = Data not available from Cal EPA "Human Exposure Based Screening Numbers Developed to Aid Estimation of Cleanup Costs for Contaminated Soil Report" November 2004/January 2005 Revision

East Orangethorpe Avenue



Legend

SV-1 - Soil Vapor Sample Number

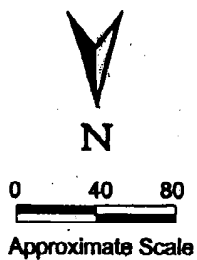
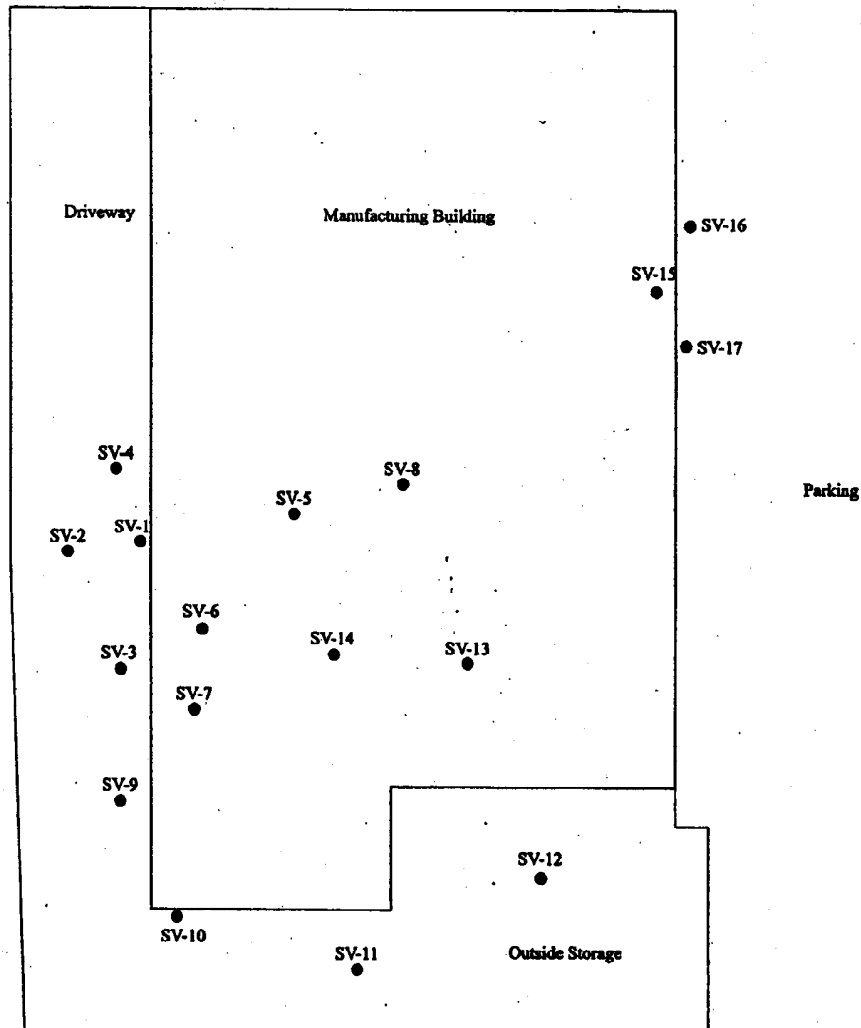
• - Soil Vapor Sample Location

NOTE: Adapted from
Optimal Technology Report



Site Name: 1551 E. Orangethorpe Avenue Fullerton, California		PLOT PLAN WITH SAMPLE LOCATIONS
Prepared By: The Reynolds Group	Project No: 7115 Date: March 2007	
		FIGURE 2

East Orangethorpe Avenue

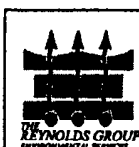


Legend

SV-1 - Soil Vapor Sample Number

• - Soil Vapor Sample Location

NOTE: Adapted from
Optimal Technology Report



Site Name:
1551 E. Orangethorpe Avenue
Fullerton, California

Prepared By:
The Reynolds Group

Project No: 7115
Date: March 2007

PLOT PLAN
WITH SAMPLE
LOCATIONS

FIGURE 2



OPTIMAL TECHNOLOGY
Specializing in Environmental Field Services

TRG 7115

RECEIVED

MAR 14 2007

20070312 Optimal Inst ID HP-5890- Series II 7115
March 12, 2007

Mr. Christopher Terpolilli
The Reynolds Group
520 W. 1st St.
Tustin, CA 92780

Dear Mr. Terpolilli:

This letter presents the results of the soil vapor investigation conducted by Optimal Technology (Optimal), for The Reynolds Group on March 9, 2007. The study was performed at 1551 E. Orangethorpe Avenue, Fullerton, California.

Optimal was contracted to perform a soil vapor survey at this site to screen for possible chlorinated solvents and aromatic hydrocarbons. The primary objective of this soil vapor investigation was to determine if soil vapor contamination is present in the subsurface soil, and if possible determine potential source area(s).

Sampling Method

Sampling was performed by hydraulically pushing 1/2" steel soil gas probes to a depth of 5.0 feet bgs. An electric rotary hammer drill was used to drill a 1.0 inch hole through the overlying surface to allow probe placement when required. The same electric hammer drill was used to push probes in areas of resistance during placement.

At each sampling location an electric vacuum pump (set to draw 0.1-2.0 liters/min of soil vapor at a maximum vacuum of 100" of water) was attached to the probe and purged prior to sample collection. Vapor samples were obtained in Hamilton gas-tight syringes by puncturing silicone tubing which connects the sampling probe and the vacuum pump. New silicone tubing was used at each sampling point to prevent cross contamination. Samples were immediately injected into the gas chromatograph after collection. New sampling probes were used after each sample with positive results. Equipment blanks using ambient air were collected throughout the day. If significant contamination is detected in these blanks, corrective actions would be taken to identify and eliminate the source, if possible.

All analyses were performed on a laboratory grade Hewlett Packard model 5890 Series II gas chromatograph equipped with a Flame Ionization Detector (FID) and an Electron Capture Detector (ECD). Restec wide bore capillary columns using hydrogen as the carrier gases were used to perform all analysis. All results were collected on a personal computer utilizing Hewlett Packard's PC based chromatographic data collection and handling system.

Quality Assurance

3-Point Calibration

An initial 3-point calibration was performed on March 9, 2007 by preparing a calibration solution from a pre-mixed standard supplied by Supelco, Inc. The standard contained common halogenated solvents and aromatic hydrocarbons (see Table 1). The individual compound concentrations in the standards ranged between 0.025 ng/ul and 0.25 ng/ul.

The initial three point calibrations consisted of 20, 100 and 500 ul injections of the calibration solutions. A calibration factor on each analyte was generated using a best fit line method using the HP data system. If the r^2 factor generated from this line was not greater than 0.990, an additional three point calibration would have been performed. Method detection limits were calculated to be 1.0 ug/L for the individual compounds.

TABLE 1

Dichlorodifluoromethane	Carbon Tetrachloride	Chloroethane
Trichlorofluoromethane	1,2-Dichloroethane	Benzene
1,1-Dichloroethene	Trichloroethene	Toluene
Methylene Chloride	1,1,2-Trichloroethane	Ethylbenzene
trans-1,2-Dichloroethene	Tetrachloroethene	m-/p-Xylene
1,1-Dichloroethane	Chloroform	o-Xylene
cis-1,2-Dichloroethene	1,1,1,2-Tetrachloroethane	Vinyl Chloride
1,1,1-Trichloroethane	1,1,2,2-Tetrachloroethane	Freon 113
4-Methyl-2-Pentanone	Cyclohexane	Acetone
Chlorobenzene	2-Butanone	

Sample Replicates

A replicate analysis (duplicate) is run when concentrations exceed the calibrated range of the instrument/detector being used. The duplicate sample is diluted using a smaller injection volume to assure that the instrument response falls within 50% of the calibrated range. In addition, a duplicate analysis is run a minimum of once each day to evaluate the reproducibility of the sampling system and instrument. If the difference between samples varies more than 20%, the entire system is evaluated and the inconsistency is determined and corrected, if possible.

Equipment Blanks

Blanks are run at the beginning of each workday, after calibrations and whenever sampling conditions appear to change. New vapor probes are used following each sample with positive results or when probes were damaged during installation. The blanks are collected using an ambient air sample. These blanks checked the septum, syringe, GC column, GC detector and the ambient air. Contamination was not found in any of the blanks analyzed during this investigation. Blank results are given along with the sample results.

Subsurface Conditions

Subsurface soil conditions at this site were predominantly sandy from ground surface to 5.0 feet bgs. These soil conditions offered sampling flows at 0" water vacuum. Depth to groundwater was unknown at the time of the investigation.

Scope of Work

To achieve the objective of this investigation a total of 19 vapor samples were collected from 17 locations throughout the site. Sampling depths, vacuum readings, purge volume and sampling volumes are given on the analytical results page. All the collected vapor samples were analyzed on-site using Optimal's mobile laboratory.

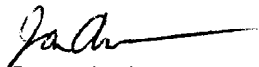
Results

During this vapor investigation fifteen sample locations contained levels of Tetrachloroethene (PCE). PCE levels ranged from 1.4 ug/L at SV-15 to 222.2 ug/L at SV-10. Fourteen sample locations contained levels of Trichloroethene (TCE) and 1,1-Dichloroethene. TCE levels ranged from 1.9 ug/L at SV-11 to 115.2 ug/L at SV-6. 1,1-Dichloroethene levels ranged from 3.2 ug/L at SV-2 to 79.7 ug/L at SV-10. Eleven sample locations contained levels of 1,1,1-Trichloroethane (TCA). TCA levels ranged from 1.2 ug/L at SV-10 to 83.5 ug/L at SV-5 & SV-12. Freon 113 was found in six locations. Freon 113 levels ranged from 3.7 ug/L at SV-8 to 8.3 ug/L at SV-14. Four samples contained levels of cis-1,2-Dichloroethene. Cis-1,2-Dichloroethene levels ranged from 1.1 ug/L at SV-2 to 2.5 ug/L at SV-3. Finally, two samples contained levels of Vinyl Chloride. Vinyl Chloride levels were 1.1 ug/L at SV-13 and 3.2 ug/L at SV-12. None of the other compounds listed in Table 1 above were detected above the listed detection limits. A complete table of analytical results is included with this report.

Disclaimer

All conclusions presented in this letter are based solely on the information collected by the soil vapor survey conducted by Optimal Technology. Soil vapor testing is only a subsurface screening tool and does not represent actual contaminant concentrations in either the soil and/or groundwater. We enjoyed working with you on this project and look forward to future projects. If you have any questions please contact me at (818) 734-6230.

Sincerely,


Jason Anderson
Project Manager



OPTIMAL TECHNOLOGY

Specializing in Environmental Field Services

SOIL VAPOR RESULTS

Site Name: 1551 E. Orangethorpe Ave., Fullerton, CA

Analyst J.A.

Collector: J.A.

Lab Name: Optimal Technology

Inst. ID: HP-5890 Series II

Detectors: FID and ECD

Date: 3/9/07

Page: 1 of 3

SAMPLE ID	N/A
Sampling Depth (Ft.)	N/A
Purge Volume (ml)	N/A
Vacuum (in. of Water)	N/A
Injection Volume (ul)	500/500
Dilution Factor (ECD/FID)	1/1

BLANK-1	SV-1	SV-1 DIL.	SV-2	SV-3	SV-4	SV-5	SV-6
N/A	5.0	5.0	5.0	5.0	5.0	5.0	5.0
N/A	1,500	1,500	1,500	1,500	1,500	1,500	1,500
N/A	0	0	0	0	0	0	0
500/500	500/500	100/500	100/500	100/500	100/500	100/500	100/500
1/1	1/1	5/1	5/1	5/1	5/1	5/1	5/1

COMPOUND	DET. LIMIT
Dichlorodifluoromethane	1.0
Chloroethane	1.0
Trichlorofluoromethane	1.0
Freon 113	1.0
Methylene Chloride	1.0
1,1-Dichloroethane	1.0
Chloroform	1.0
1,1,1-Trichloroethane	1.0
Carbon Tetrachloride	1.0
1,2-Dichloroethane	1.0
Trichloroethene (TCE)	1.0
1,1,2-Trichloroethane	1.0
Tetrachloroethene (PCE)	1.0
1,1,1,2-Tetrachloroethane	1.0
1,1,2,2-Tetrachloroethane	1.0
Vinyl Chloride	1.0
Acetone	1.0
1,1-Dichloroethene	1.0
trans-1,2-Dichloroethene	1.0
2-Butanone (MEK)	1.0
cis-1,2-Dichloroethene	1.0
Cyclohexane	1.0
Benzene	1.0
4-Methyl-2-Pentanone	1.0
Toluene	1.0
Chlorobenzene	1.0
Ethylbenzene	1.0
m/p-Xylene	1.0
o-Xylene	1.0

CONC (ug/L)	CONC (ug/L)	CONC (ug/L)	CONC (ug/L)	CONC (ug/L)	CONC (ug/L)	CONC (ug/L)	CONC (ug/L)
ND	ND	ND	ND	ND	ND	ND	ND
ND	ND	ND	ND	ND	ND	ND	ND
ND	ND	ND	ND	ND	ND	ND	ND
ND	4.7	5.5	ND	ND	ND	ND	ND
ND	ND	ND	ND	ND	ND	ND	ND
ND	ND	ND	ND	ND	ND	ND	ND
ND	ND	ND	ND	ND	ND	ND	ND
ND	53.6	55.0	3.4	12.7	11.2	83.5	71.8
ND	ND	ND	ND	ND	ND	ND	ND
ND	ND	ND	ND	ND	ND	ND	ND
ND	69.9	70.7	11.0	38.6	24.2	58.2	115.2
ND	ND	ND	ND	ND	ND	ND	ND
ND	OS	78.8	15.3	36.4	39.2	35.3	80.3
ND	ND	ND	ND	ND	ND	ND	ND
ND	ND	ND	ND	ND	ND	ND	ND
ND	ND	ND	ND	ND	ND	ND	ND
ND	ND	ND	ND	ND	ND	ND	ND
ND	17.4	18.2	3.2	25.3	9.1	40.4	65.3
ND	ND	ND	ND	ND	ND	ND	ND
ND	ND	ND	ND	ND	ND	ND	ND
ND	ND	ND	1.1	2.5	ND	1.2	1.2
ND	ND	ND	ND	ND	ND	ND	ND
ND	ND	ND	ND	ND	ND	ND	ND
ND	ND	ND	ND	ND	ND	ND	ND
ND	ND	ND	ND	ND	ND	ND	ND
ND	ND	ND	ND	ND	ND	ND	ND
ND	ND	ND	ND	ND	ND	ND	ND
ND	ND	ND	ND	ND	ND	ND	ND

Note: ND = Below Listed Detection Limit; OS = Off the electronic scale of detector



Site Name: 1551 E. Orangethorpe Ave., Fullerton, CA

Analyst J.A.

Lab Name: Optimal Technology

Inst. ID: HP-5890 Series II

Collector: J.A.

Detectors: FID and ECD

Page: 2 of 3

SV-7	SV-8	SV-9	SV-10	SV-11	SV-11 Dup	SV-12	SV-13
5.0	5.0	5.0	5.0	5.0	5.0	5.0	5.0
1,500	1,500	1,500	1,500	1,500	1,500	1,500	1,500
0	0	0	0	0	0	0	0
100/500	100/500	100/500	100/500	100/500	100/500	100/500	100/500
5/1	5/1	5/1	5/1	5/1	5/1	5/1	5/1

[illegible]

P.O. Box 4448 • Chatsworth, CA 91313 • Toll Free (877) SOIL GAS (764-5427) • (818) 734-6230 • Fax (818) 734-6235

MWNA-WZI 106909



Site Name: 1551 E. Orangethorpe Ave., Fullerton, CA
Analyst J.A.
Collector: J.A.

Lab Name: Optimal Technology
Inst. ID: HP-5890 Series II
Detectors: FID and ECD

Page: 3 of 3

[illegible]

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MWNA-WZI 106910



**COUNTY OF ORANGE
HEALTH CARE AGENCY**

**REGULATORY HEALTH SERVICES
ENVIRONMENTAL HEALTH**

JULIETTE A. POULSON, RN, MN
DIRECTOR

MIKE SPURGEON
DEPUTY AGENCY DIRECTOR
REGULATORY HEALTH SERVICES

RICHARD SANCHEZ, REHS, MPH
DIRECTOR
ENVIRONMENTAL HEALTH

MAILING ADDRESS:
1241 E DYER ROAD STE 120
SANTA ANA, CA 92705-5611
TELEPHONE: (714) 433-8000
FAX: (714) 754-1768
E-MAIL: ehealth@ochca.com

HAZARDOUS MATERIALS MANAGEMENT SECTION

Remedial Action Agreement Notification (Revised)

Orange County Health Care Agency, Environmental Health proposes to enter into a Remedial Action Agreement with the Responsible Party listed below. Pursuant to Section 101487, Article 5, Chapter 4, Part 3, Division 101 of the Health & Safety Code, the following information is provided as notification to your Agency.

A. Site Name <u>Fullerton Business Park-North</u> Site Address <u>1551 Orangethorpe Avenue, Fullerton, CA 92833</u>	
B. Responsible Party <u>Universal Molding Company</u> Mailing Address <u>9151 East Imperial Highway, Downey, CA 90240</u> Contact Person <u>Dominick Baione</u> Telephone <u> </u> Fax <u> </u>	
C. Site Owner <u>Universal Molding Company</u> Mailing Address <u>Same As Above</u> Telephone <u>(714) 920-9362</u> Fax <u> </u>	
D. Any known or planned Local, State or Federal regulatory involvement? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <u>Remedial investigation/action oversight</u>	
E. Notification Date <u>July 24, 2007</u> If you have questions, please contact Luis Lodrigueza at (714) 433-6253 (Phone) or (714) 754-1768 (Fax).	
Department of Toxic Substances Control <input checked="" type="checkbox"/> Attn: Greg Holmes, Unit Chief Southern California Cleanup Operations 5796 Corporate Avenue Cypress, CA 90630 Phone: (714) 484-5461 Fax: (714) 484-5438	California Regional Water Quality Control <input checked="" type="checkbox"/> Board - Santa Ana Region Attn: Ann Sturdivant, Chief SLIC.DOD.AGT Section 3737 Main Street, Suite 500 Phone: (951) 782-4130 Riverside, CA 92501-3339 Fax: (951) 781-6288